

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
NEWNAN DIVISION**

ETHAN RADVANSKY, on behalf of
himself and those similarly situated,

Plaintiff,

v.

KENDO HOLDINGS, INC., d/b/a Fenty
Beauty,

Defendant.

Case No. 3:23-cv-00214-LMM

**DEFENDANT KENDO HOLDINGS, INC.'S
MOTION FOR JUDGMENT ON THE PLEADINGS**

COMES NOW, Defendant Kendo Holdings, Inc. d/b/a Fenty Beauty (“Kendo”), by and through undersigned counsel and files this Motion for Judgment on the Pleadings pursuant to Fed. R. Civ. P. 12(c). As shown in Kendo’s contemporaneously filed Memorandum of Law in Support of this Motion, which is incorporated herein by reference, Plaintiff’s claims fail as a matter of law.

WHEREFORE, Kendo respectfully requests that this Court:

- (1) Grant the Motion for Judgment on the Pleadings;
- (2) Deny Plaintiff’s requests for relief;
- (3) Cast all costs against Plaintiff; and
- (4) Grant such other and further relief as this Court deems just and proper.

Respectfully submitted this 4th, day of August 2025.

/s/ Lori Chang

Steven J. Rosenwasser
(SBN GA 614908)
William E. Eye
(SBN GA 688914)
Greenberg Traurig, LLP
3333 Piedmont Road NE, Suite 2500
Atlanta, GA 30305
Telephone: 678.553.2100
Facsimile: 678.553.2212
Email: Steven.Rosenwasser@gtlaw.com
eyew@gtlaw.com

Lori Chang
(SBN CA 228142) (*pro hac vice*)
Greenberg Traurig, LLP
1840 Century Park East, Suite 1900
Los Angeles, California 90067-2121
Telephone: 310.586.7700
Facsimile: 310.586.7800
Email: changl@gtlaw.com

*Attorneys for Defendant Kendo Holdings,
Inc.*

CERTIFICATE OF COMPLIANCE

Counsel hereby certifies that the text of this document has been prepared with Times New Roman 14-point font, one of the font and point selections approved by the Court in Local Rule 5.1(C).

/s/ Lori Chang

Lori Chang

CERTIFICATE OF SERVICE

This is to certify that on this 4th day of August, 2025, I electronically filed the foregoing **MOTION FOR JUDGMENT ON THE PLEADINGS** with the Clerk of Court using the CM/ECF efilng system, which will automatically send email notification of such filing to all attorneys of record as follows:

James Davidson
Aaron D. Radbil
GREENWALD DAVIDSON & RADBIL, PLLC
5550 Glades Road, Suite 500
Boca Raton, FL 33431
Email: jdavidson@gdrlawfirm.com
aradbil@gdrlawfirm.com
Counsel for Plaintiff

Steven Howard Koval
THE KOVAL FIRM, LLC
3575 Piedmont Road NE
Building 15, Suite 120
Atlanta, GA 30305
Email: shkoval@aol.com
Counsel for Plaintiff

Anthony Paronich
PARONICH LAW, P.C.
350 Lincoln Street, Suite 2400
Hingham, MA 02043
Email: anthony@paronichlaw.com
Counsel for Plaintiff

This 4th day of August, 2025.

/s/ Lori Chang
Lori Chang